

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN**

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**THE PAPER MILL STORE, INC.**, a Wisconsin corporation,

Case No. 3:14-cv-00354-wmc

Plaintiff,

v.

**AARBS PAPER INC.**, a Washington corporation;  
and **DOES 1-10**, inclusive,

Defendants.

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*DMC* ~~[PROPOSED]~~ **STIPULATED JUDGMENT AND PERMANENT INJUNCTION**

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With the consent of Plaintiff The Paper Mill Store and Defendant Aarbs Paper Inc., and the approval of their respective counsel, Plaintiff and Defendant request that this Stipulated Permanent Injunction and Consent Judgment ("Consent Judgment") based on the following stipulated facts:

1. This Court has subject matter jurisdiction over this action and personal jurisdiction over the parties.
2. On May 16, 2014, Plaintiff filed a complaint alleging that Defendant infringed the copyrights in product images available on The Paper Mill Store Website.
3. Defendant acknowledges and does not contest that Plaintiff owns valid copyrights in the product images available on Plaintiff's website, located at the following address: [<http://www.thepapermillstore.com>](http://www.thepapermillstore.com) ("The Paper Mill Store Website").
4. Plaintiff has agreed to settle and resolve its claims in this action on the express condition that Defendants agree to entry of a judgment in the amount of \$150,000, in addition to an injunction permanently enjoining Defendant from infringing any of Plaintiff's copyrights,

including Plaintiff's copyrights in the product images available on The Paper Mill Store Website, at any time after the entry of this Consent Judgment.

5. Defendants consent to the entry of this Consent Judgment subject to additional terms set forth in a confidential settlement agreement executed by the Parties on August 29, 2014 (the "Confidential Settlement Agreement").

**ACCORDINGLY, IT IS ORDERED, ADJUDGED, AND DECREED THAT:**

A. Judgment is hereby entered in favor of Plaintiff and against Defendant in the amount of \$150,000.00.

B. Defendant and its assigns and any other person(s) acting for or on their behalf are hereby permanently enjoined from copying, reproducing, creating derivative works from, and/or publishing any of Plaintiff's copyrighted material, including the product images on The Paper Mill Store Website.

C. Plaintiff may seek immediate specific enforcement of this Order by application to this Court.

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D. The Court shall maintain jurisdiction over this matter both for enforcement of this Consent Judgment and the enforcement of the Confidential Settlement Agreement.

IT IS SO STIPULATED.

Dated: September 12, 2014

Dated: September 12, 2014

By: s/Conor Kennedy

By: s/ Sean M. McChesney

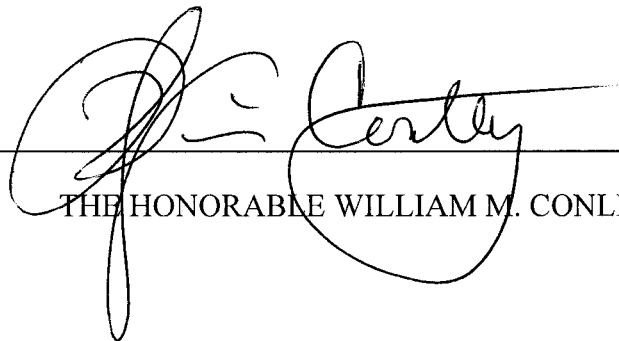
Jeffrey M. Rosenfeld  
Conor H. Kennedy  
**KRONENBERGER ROSENFELD, LLP**  
150 Post Street, Suite 520  
San Francisco, CA 94108  
Telephone: (415) 955-1155  
Facsimile: (415) 955-1158  
jeff@KRInternetLaw.com  
conor@KRInternetLaw.com

Venkat Balasubramani (admitted pro hac vice)  
Sean M. McChesney (admitted pro hac vice)  
**FOCAL PLLC**  
800 Fifth Avenue, Suite 4100  
Seattle, WA 98104  
Telephone: (206) 617-3040  
Facsimile: (206) 260-3966  
venkat@focallaw.com  
sean@focallaw.com

Attorneys for Plaintiff The Paper Mill Store, Inc. Attorneys for Defendant Aarbs Paper Inc.

**IT IS SO ORDERED .**

Dated: September 16, 2014



THE HONORABLE WILLIAM M. CONLEY